

From: Bennett, Jim
To: [Trey Driscoll \(tdriscoll@dudek.com\)](mailto:tdriscoll@dudek.com)
Cc: [Gungle, Ashley](#)
Subject: RE: Comments on GW Resources Allocation and Identification Plan
Date: Thursday, July 18, 2013 3:24:00 PM
Attachments: [Copy of PDS2012-3910-120005-PDS-PLN-Specialist Checklist-Groundwater.xlsx](#)

It always helps to include the attachment!

Jim Bennett, P.G. #7707, CHG#854
Groundwater Geologist

County of San Diego

Planning & Development Services
5510 Overland Avenue, Suite 110, San Diego, CA 92123
Phone: 858-694-3820 Fax: 858-694-3373

From: Bennett, Jim
Sent: Thursday, July 18, 2013 3:23 PM
To: Trey Driscoll (tdriscoll@dudek.com)
Cc: Gungle, Ashley
Subject: Comments on GW Resources Allocation and Identification Plan

Hi Trey,

Attached are my comments. I look forward to receiving the outstanding reports early next week. Thanks for all your hard work and diligence on these projects, I really appreciate it.

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ATTACHMENT A
PROJECT ISSUE CHECKLIST

PDS (Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
	1		The following comments are provided based on a review of the <i>Groundwater Resources Identification and Allocation Plan</i> dated March 2013 by Dudek:	N/A	7/18/2013
	2		Section 1.2 Groundwater Supplies: This project is relying upon Padre Dam Municipal Water District as a backup supplier of all of Soitec's projects. Please discuss this in detail in this section and possibly rename this section as "Water Supplies." Imported water should be included as bullet point below the other three bullets.		7/18/2013
	3		Table 1 Description of Projects in the Cumulative Water Demand Scenario: Please update the project schedule as follows: The Tule Wind Project has been delayed by at least a year and has a start date of September 2014. Please check regarding the Shu'luuk Wind timing as it may have been eliminated. The Rough Acres Campground is likely to delayed until January 2015. The LanEast and LanWest projects are unlikely to start in September 2014 as processing the permits has not yet commenced and should be pushed out at least 12 months. The Buckman Springs Borrow Pit is already permitted and has been mining under a new use permit and Reclamation Plan since 2005. Star Ranch should be added to the cumulative projects list as they are continuing to actively process their project and it has not yet been determined whether or not there is adequate water to meet the demand of the project.		7/18/2013

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4		<p>Page 12: Please delete the following statement: <i>"The regional fracture rock aquifer has appeared to support existing demands, since no major overdraft condition has been identified by the County in its groundwater limitations map."</i> The County has not monitored the area in question to determine whether or not the aquifer has supported existing demand. Therefore the Groundwater Limitations Map is not relevant to whether or not there is an overdraft condition or water problems in the subject area.</p>	7/18/2013
5		<p>In Section 5, only include sources of water in which impacts to groundwater resources have been adequately evaluated. Please remove Live Oak Springs and Jacumba Community Services District as potential water sources unless there is groundwater investigation work to support the volume of water that could potentially be used.</p>	7/18/2013
6		<p>In Section 5, add Pine Valley Mutual Water Company if you have reached agreement with them as a potential source and have analysis that supports additional water production from this source.</p>	7/18/2013
7		<p>Table 4: The San Diego Freedom Ranch Expansion will have a maximum production amount of 10 acre-feet per year and is proposed to met entirely by on-site wells. The Major Use Permit modification for the project is still being processed by the County. The Star Ranch project has a demand of 388 acre-feet per year for 453 residential units and other commercial uses on 2,160 acres of land. The demand is proposed to be met entirely by on-site groundwater wells. The project is still being processed in-house. Please update both projects with this new information.</p>	7/18/2013

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8		Table 5: For the Rugged and Tierra Del Sol on-site wells, 205 acre-feet per year and 98.4 acre-feet per year as listed have not been approved as sustainable by the County of San Diego. This number should be conservatively constrained to the amount that is going to be used just for the Rugged project and just for the Tierra Del Sol project and is subject to change per County comments since the investigations will still undergo County review.		7/18/2013
9		Table 5: For LanWest and LanEast, 80.7 acre-feet per year is speculative since no aquifer testing has been conducted. Without any aquifer testing performed which takes into account well interference including impacts to offsite users and groundwater dependent habitat, perhaps a more conservative approach would be to take the value you have and including perhaps 25% of the value estimated at this point as potentially viable from the sites.		7/18/2013
10		Table 5: For Jewell Valley it is speculative that water from this ranch could be utilized. Please remove from the report unless a Major Use Permit is applied for a Groundwater Extractive Operation. For Ewiiapaayp Reservation, use of their wells is also speculative unless an agreement with the Ewiiapaayp Reservation is reached to utilize the water. Please provide additional information that substantiates that water from this Indian Reservation is possible. Additionally, the aquifer testing was incomplete to bear out the amounts listed. If this source is to be left in the report, I would conservatively assume 25% of the value reported as potentially viable from each well.		7/18/2013
11		Table 5: Jacumba Community Services District and Live Oak Springs Water Company should be removed unless impacts to groundwater resources have been adequately evaluated and submitted for County review.		7/18/2013